

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

THE AMERICAN SOCIETY OF MEDIA
PHOTOGRAPHERS, INC., GRAPHIC
ARTISTS GUILD, PICTURE ARCHIVE
COUNCIL OF AMERICA, INC., NORTH
AMERICAN NATURE PHOTOGRAPHY
ASSOCIATION, PROFESSIONAL
PHOTOGRAPHERS OF AMERICA, LEIF
SKOOGFORS, AL SATTERWHITE,
MORTON BEEBE, ED KASHI, JOHN
SCHMELZER, and SIMMS TABACK, on
behalf of themselves and all others similarly
situated,

Plaintiffs,

v.

GOOGLE INC.

Defendant.

Civil Action No. 10 Civ. 2977 (DC)

ECF Case

**DEFEDANT GOOGLE INC.'S
NOTICE OF MOTION AND MOTION TO DISMISS**

PLEASE TAKE NOTICE that upon the accompanying (a) Memorandum of Law and (b) Request for Judicial Notice dated December 22, 2011 and the exhibits thereto, Defendant Google Inc. (“Google”) by its attorneys Durie Tangri LLP, will move this Court at such time as the Court may direct at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 15B, New York, New York, for an order granting Google Inc.’s Motion to Dismiss.

Dated: December 22, 2011

Respectfully submitted,

By: /s/ Joseph C. Gratz
Daralyn J. Durie (*pro hac vice*)
ddurie@durietangri.com
Joseph C. Gratz (*pro hac vice*)
jgratz@durietangri.com
DURIE TANGRI LLP
217 Leidesdorff Street
San Francisco, CA 94111
Telephone: 415-362-6666
Facsimile: 415-236-6300

Attorneys for Defendant GOOGLE INC.